

AO 91 (Rev. 11/11) Criminal Complaint

United States District Court
Southern District of Texas
FILED

UNITED STATES DISTRICT COURT

OCT 31 2019

for the

Southern District of Texas

David J. Bradley, Clerk

United States of America

v.

- 01 Juan Marcus LAUREL, YOB: 1975 (USA)

- 02 Ruben ALANIZ, YOB: 1962 (USA)

Case No. M-19-2666-M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 10/30/2019 in the county of Duval in the
Southern District of Texas, the defendant(s) violated:

Code Section

21 USC 846
21 USC 841

Offense Description

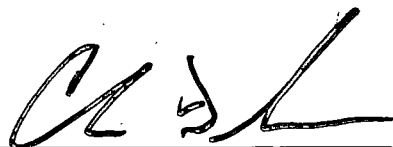
Conspiracy to Possess with the Intent to Distribute and Possession with
Intent to Distribute Cocaine, approximately 45.95 kilograms, a schedule II
controlled substance.

This criminal complaint is based on these facts:

(See Attachment I).

☐ Continued on the attached sheet.

Approved:

Robert Wills, 4 Ave
10/31/2019

Complainant's signature

Christopher Donahue, DEA Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 10/31/2019 - B. S. 72.1

Judge's signature

City and state: McAllen, Texas

Juan F. Alanis, U.S. Magistrate Judge

Printed name and title

ATTACHMENT 1

1. From October 22, 2019 through October 30, 2019, DEA and U.S. Border Patrol Agents observed that a tractor with an attached flatbed trailer, displaying TX/LP: Y45439, registered to Juan LAUREL was parked at a property associated with Ruben ALANIZ in Rio Grande City, Texas. The flatbed trailer, displaying TX/LP: Y45439 was previously registered to ALANIZ. On numerous occasions agents have observed ALANIZ at this property. Furthermore, agents have observed that ALANIZ appears to be the caretaker and owner of the property.
2. On October 30, 2019, at approximately 8:00 p.m., agents observed that the tractor-trailer had left the property associated to Ruben ALANIZ and travel north from Rio Grande City, Texas towards Freer, Texas.
3. At approximately 10:21 p.m., a Freer, Texas Police Department Officer conducted an independent probable cause vehicle stop on the tractor-trailer for a traffic violation. Juan LAUREL was subsequently identified as the tractor-trailer's driver and sole occupant. During the stop, a Border Patrol K-9 officer conducted an exterior sniff of the tractor-trailer and alerted to the presence of narcotics in the flatbed trailer. During a subsequent search of the tractor-trailer agents located a concealed compartment in a tool box attached to the undercarriage of the trailer. In the compartment, agents located 39 brick shaped packages, weighing approximately 45.95 kilograms. The outside of the brick packages were wet and smelled like diesel fuel. Liquid which smelled like diesel fuel was present at the bottom of the concealed compartment. A field test of a sample from one of the packages tested positive for the characteristics and properties of cocaine which is a Schedule II Controlled Substance.
4. During a recorded Mirandized post-arrest interview, LAUREL stated that ALANIZ transferred ownership of ALANIZ's flatbed trailer to LAUREL for the purposes of smuggling cocaine for ALANIZ. LAUREL stated that on October 30, 2019, he picked up his tractor and flatbed trailer which contained cocaine from a property owned by ALANIZ in Rio Grande City, Texas and was going to deliver the cocaine to San Antonio, Texas. LAUREL stated that ALANIZ was present when LAUREL picked up his tractor-trailer and subsequently provided him with \$400 for fuel expenses for his trip to San Antonio, Texas. LAUREL stated that the flatbed trailer was loaded with cocaine prior to LAUREL picking up the trailer on October 30, 2019 and that he believed the flatbed trailer was loaded with cocaine at ALANIZ's property. LAUREL stated that ALANIZ previously told him he was transporting cocaine on his trips to San Antonio, Texas. LAUREL stated that he was going to be paid \$6,000.00 by ALANIZ for transporting the cocaine. LAUREL stated that he has transported cocaine for ALANIZ on multiple occasions in the past and was paid between \$3,000 and \$6,000 per trip by ALANIZ.
5. On October 30, 2019, agents executed a federal search warrant at the property associated to ALANIZ and the same property where the flatbed trailer was parked prior to LAUREL picking it up and leaving for Freer, Texas. At the property agents observed packaging material consistent with narcotics trafficking activities.

6. On October 30, 2019, agents arrested ALANIZ in Rio Grande City, Texas. ALANIZ stated that his daughter owned the property where the LAUREL's tractor-trailer was previously parked, however his daughter doesn't live there.